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July 28, 2025

VIA ELECTRONIC FILING

Honorable Peggy Kuo U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: Trustees of the Plumbers Local Union No. 1 Welfare Fund,
et al. v. Spray in Place Solutions, LLC, et al. 24 CV 2568 (KAM) (PK)***
Letter Motion Response to Request to Adjourn Pre-motion Discovery Conference

Dear Judge Kuo:

This firm represents Plaintiffs in the above-captioned action. We write in response to the Defendants' Letter Motion requesting to adjourn the conference scheduled for Tuesday, July 29, 2025. Although Plaintiffs consent to the adjournment, we respectfully request that the Court adjourn the conference to a later date to resolve the discovery dispute, and, if the dispute cannot be resolved for a briefing schedule to brief a motion to compel. Until the Plaintiffs receive the documents the Defendants are obligated to provide and Defendants submit to the audit as required under the terms of the March 25, 2025 Stipulation, the Plaintiffs do not believe an indefinite adjournment is appropriate.

Accordingly, the Plaintiffs respectfully request the conference with the Court currently scheduled for Tuesday, July 29, 2025 be adjourned as requested by the Defendants and rescheduled for a later date.

Respectfully submitted,

/s/ Diana R. Cohn
Diana R. Cohn (NY Bar No. 6141097)
Counsel for the Plaintiffs